

STIP

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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

KATHERINE MAYORGA, an individual)

2:19-cv-00168-JAD- DJA

Plaintiff,)

vs.)

CRISTIANO RONALDO, individually,)

Does I-XX and Roe Corporations I-XX;)

Defendants.)

**STIPULATION TO EXTEND THE TIME FOR THE NEW YORK TIMES COMPANY
TO RESPOND TO DEFENDANT'S MOTION FOR A PROTECTIVE ORDER [ECF 161]**

(First Request)

IT IS HEREBY STIPULATED AND AGREED BY AND BETWEEN plaintiff

KATHERINE MAYORGA by and through her attorney LESLIE MARK STOVALL, ESQ. and

defendant, CRISTIANO RONALDO, by and through his attorney PETER S. CHRISTIANSEN,

ESQ., that the deadline for The New York Times Company's oppositions to defendant's motion

for a protective order [ECF No. 161] and plaintiff's motion for an injunction [ECF No. 168] and

any related motion work, including a motion to intervene, be set for December 29, 2021.

1
2 The New York Times Company (“The Times”) is not a party to this action but was
3 provided a copy of defendant’s motion for a protective order and intends to file a motion to
4 intervene, an opposition to defendant’s motion for a protective order [ECF 161], and an
5 opposition to plaintiff’s motion for an injunction [ECF 168].
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7 Plaintiff consents to the participation of The Times.

8 Defendant reserves the right to oppose intervention by The Times but both the parties
9 waive any arguments that a motion to intervene and accompanying responses to Defendants
10 Motion for Protective Order and Plaintiff’s Motion for Injunction are untimely if they are
11 submitted to court by December 29, 2021.
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13 The parties further agree the deadline for Defendant’s Opposition to Plaintiff’s Motion
14 for Injunction [ECF 168] and the deadline for Defendant’s Reply to any opposition The New
15 York Times may file in response to Defendant’s Motion for Protective Order [ECF 161] be
16 extended to January 12, 2022.
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18 Good cause exists to set the foregoing deadlines for The Times and for the parties’
19 extensions given the intervening holidays and counsel’s travel schedules and because counsel for
20 TheTimes was only recently retained and The Times is not yet a party to this action, and all
21 counsel require additional time to sufficiently prepare the necessary filings. Setting a briefing
22 schedule will promote the efficient, speedy, and just resolution of the motions at hand.
23
24

25 Dated this 21st December, 2021
26 STOVALL AND ASSOCIATES
27 /s/ *Leslie Mark Stovall*

28 LESLIE MARK STOVALL, ESQ.
Stovall & Associates

Dated this 21st December, 2021
CHRISTIANSEN TRIAL LAWYERS
/s/ *Kendele L. Works*

PETER S. CHRISTIANSEN, ESQ.
KENDELEE LEASCHER WORKS, ESQ.

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6 Agreed to by:

7 MCLETCHIE LAW
8 /s/ Margaret A. McLetchie

9 _____
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15 Counsel for Proposed Intervenor,
16 The New York Times Company
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ORDER

IT IS HEREBY ORDERED that The New York Times Company's motion to intervene, opposition to defendant's motion for a protective order [ECF 161], and opposition to plaintiff's motion for a protective order [ECF No. 168] be set for December 29, 2021.

DATED this 29th day of December, 2021



THE HONORABLE DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE